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INTERVENTION

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

M ARC SPITZER

Commissioner

DOCKETED

SEP 27 2002

DOCKETED BY

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2002 SEP 27 P 4: 27

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
AN ORDER OR ORDERS AUTHORIZING IT TO
ISSUE, INCUR, OR ASSUME EVIDENCES OF
LONG TERM INDEBTEDNESS; TO ACQUIRE
A FINANCIAL INTEREST OR INTERESTS IN
AN AFFILIATE OR AFFILIATES; TO LEND
MONEY TO AN AFFILIATE OR AFFILIATES;
AND TO GUARANTEE THE OBLIGATIONS OF
AN AFFILIATE OR AFFILIATES

DOCKET NO. E-01345A-02-0707

MOTION TO INTERVENE

Tucson Electric Power Company ("TEP"), through undersigned counsel, and pursuant to A.A.C.
R14-3-105, hereby moves the Arizona Corporation Commission ("Commission") for an order allowing
TEP to intervene in the above-captioned proceeding. In support hereof, TEP state as follows:

1. TEP is investor-owned utility that owns generation facilities in Arizona. As one of the
largest electric service providers in Arizona, TEP is directly and substantially interested in and affected
by the issues to be addressed in this proceeding.

2. TEP's participation in this proceeding will not unduly broaden the nature or scope of this
proceeding.

3. No other party or intervenor to this proceeding can adequately represent the interests of
TEP in this proceeding.

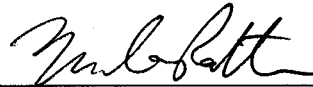
5. Service of all correspondence, documents or pleadings should be made to counsel for TEP
as follows:

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2 Michael W. Patten
3 Roshka Heyman & DeWulf
4 One Arizona Center
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9 rheyman@rhd-law.com
10 mpatten@rhd-law.com

11
12 WHEREFORE, TEP respectfully requests that the Commission issue an order granting this Motion
13 to Intervene.

14 RESPECTFULLY SUBMITTED this 27th day of September 2002.

15 ROSHKA HEYMAN & DEWULF, PLC

16 By 
17 Raymond S. Heyman
18 Michael W. Patten
19 One Arizona Center
20 400 East Van Buren Street, Suite 800
21 Phoenix, Arizona 85004

22 Attorneys for Tucson Electric Power Company

23 **ORIGINAL and 10 COPIES** filed
24 September 27, 2002, with:

25 Docket Control
26 ARIZONA CORPORATION COMMISSION
27 1200 West Washington Street
Phoenix, Arizona 85007

1 **COPIES** hand-delivered September 27, 2002, to:

2 Lyn Farmer, Chief Administrative Law Judge
3 Hearing Division
4 Arizona Corporation Commission
5 1200 W. Washington
6 Phoenix, AZ 85007

7 Chris Kempley, Chief Counsel
8 Legal Division
9 Arizona Corporation Commission
10 1200 W. Washington
11 Phoenix, AZ 85007

12 Ernest Johnson, Director
13 Utilities Division
14 Arizona Corporation Commission
15 1200 W. Washington
16 Phoenix, AZ 85007

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27 **COPIES** mailed September 27, 2002 to:

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By: 